

REMARKS

This Application has been carefully reviewed in light of the Office Action mailed July 5, 2005 ("Office Action"). At the time of the Office Action, Claims 1-37 were pending in the application. In the Office Action, the Examiner rejects Claims 1-37. To advance prosecution of this case, Applicant amends Claims 1, 12, 14, and 26. Applicant does not admit that any amendments are necessary due to any prior art or any of the Examiner's rejections. Applicant respectfully requests reconsideration and allowance of all pending claims.

Section 102 Rejections

The Examiner rejects Claims 1-5, 10, 12-14, 16-17, 22, 24-26, 28-29, 34, and 36-37 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent Application No. 2002/0070915 issued to Mazza et al. ("*Mazza*"). Applicant respectfully requests reconsideration and allowance of Claims 1-5, 10, 12-14, 16-17, 22, 24-26, 28-29, 34, and 36-37.

Claim 1, 14, and 26

Mazza fails to teach, suggest, or disclose at least two aspects of amended Claim 1. First, the cited reference fails to teach, suggest, or disclose that "at least some of the controller signal relationships are associated with different users" as recited, in part, in amended Claim 1. Second, *Mazza* fails to teach, suggest, or disclose an interface application operable to "determine at least one particular controller signal relationship based at least in part on an identity of a particular user" as recited, in part, in amended Claim 1.

First, the cited reference fails to teach, suggest, or disclose that "at least some of the controller signal relationships are associated with different users" as recited, in part, in amended Claim 1. *Mazza* discloses a configuration engine for mapping buttons of the hand-held controller "to specific regions within the proprietary application." (*Mazza*; p. 3, ¶ 41). *Mazza* teaches that the controller may "come with a 'pre-installed' set of configuration options which can be pre-selected" to integrate the controller "with popular trading applications 'out of the box.'" (*Mazza*; pp. 3-4, ¶ 41). There is nothing, however, in *Mazza* that teaches, suggests, or discloses that "at least some of the controller signal relationships are associated with different users" as recited, in part, in amended Claim 1. Because *Mazza* fails

to teach, suggest, or disclose this aspect of amended Claim 1, *Mazza* does not support the rejection.

Second, *Mazza* fails to teach, suggest, or disclose an interface application operable to “determine at least one particular controller signal relationship based at least in part on an identity of a particular user” as recited, in part, in amended Claim 1. As shown above, *Mazza* discloses a hand-held controller that may “come with a ‘pre-installed’ set of configuration options which can be pre-selected” to integrate the device “with popular trading applications ‘out of the box.’” (*Mazza*; pp. 3-4, ¶ 41). Thus, the configuration of the hand-held controller in *Mazza* is pre-selected according to the trading application. There is nothing in *Mazza* that teaches, suggests, or discloses an interface application operable to “determine at least one particular controller signal relationship based at least in part on an identity of a particular user” as recited, in part, in amended Claim 1. Because the cited reference fails to teach, suggest, or disclose this aspect of amended Claim 1, the cited reference does not support the rejection. For at least these reasons, Applicant respectfully requests reconsideration and allowance of amended Claim 1.

In rejecting Claims 14 and 26, the Examiner employs the same rationale used to reject Claim 1. Accordingly, for at least the reasons stated with respect to amended Claim 1, Applicant respectfully requests reconsideration and allowance of amended Claims 14 and 26.

Amended Claim 12

Mazza fails to teach, suggest, or disclose at least two aspects of amended Claim 12. First, the cited reference fails to teach, suggest, or disclose “a controller configuration interface” as recited, in part, in amended Claim 12. Second, *Mazza* fails to teach, suggest, or disclose an interface application operable to “generate one or more of the plurality of controller signal relationships based on the received configuration instructions” as recited, in part, in amended Claim 12.

First, the cited reference fails to teach, suggest, or disclose “a controller configuration interface” as recited, in part, in amended Claim 12. In the Office Action, the Examiner interprets the configuration engine in *Mazza* to be an equivalent to “a controller configuration interface” as recited in amended Claim 12. Applicants respectfully traverse this assertion. The configuration engine in *Mazza* is not an interface. Rather, the configuration engine in *Mazza* maps buttons of the hand-held controller “to specific regions within the proprietary

application.” There is nothing in *Mazza* that teaches, suggests, or discloses “a controller configuration interface” as recited, in part, in amended Claim 12. Because *Mazza* fails to teach, suggest, or disclose this aspect of amended Claim 12, *Mazza* does not support the rejection.

Second, *Mazza* fails to teach, suggest, or disclose an interface application operable to “generate one or more of the plurality of controller signal relationships based on the received configuration instructions” as recited, in part, in amended Claim 12. As shown above, *Mazza* discloses a hand-held controller that may “come with a ‘pre-installed’ set of configuration options which can be pre-selected” to integrate the device “with popular trading applications ‘out of the box.’” (*Mazza*; pp. 3-4, ¶ 41). However, *Mazza* makes no mention of “received configuration instructions” as recited, in part, in amended Claim 12. Furthermore, the cited reference fails to teach, suggest, or disclose generating “one or more of the plurality of controller signal relationships based on the received configuration instructions” as recited, in part, in amended Claim 12. Because *Mazza* fails to teach, suggest, or disclose these aspects of amended Claim 12, *Mazza* does not support the rejection. For at least these reasons, Applicant respectfully requests reconsideration and allowance of amended Claim 12.

Claims 2-5, 10, 13, 16-17, 22, 24-25, 28-29, 34, and 36-37

Claims 2-5, 10, 13, 16-17, 22, 24-25, 28-29, 34, and 36-37 depend from independent claims shown above to be allowable. In addition, these claims recite further elements not taught, suggested, or disclosed by *Mazza*. In particular, the cited reference fails to teach, suggest, or disclose “a plurality of keyboard signal relationships, each keyboard signal relationship associating one of a plurality of keyboard signals with one of the plurality of trading system commands” as recited, in part, in Claim 2. In addition, *Mazza* fails to teach, suggest, or disclose an interface application operable to “reconfigure one or more of the plurality of controller signal relationships based on the received reconfiguration instructions” as recited, in part, in Claim 13.

First, the cited reference fails to teach, suggest, or disclose a mapping module that defines “a plurality of keyboard signal relationships, each keyboard signal relationship associating one of a plurality of keyboard signals with one of the plurality of trading system commands” as recited, in part, in Claim 2. *Mazza* discloses a hand-held controller that interacts with software components to send trading commands to an electronic trading

application. (*Mazza*; p. 3, ¶¶ 35-41; Fig. 3). One of these software components is a configuration engine used to map the buttons of the hand-held controller to “specific regions within the proprietary application.” (*Mazza*; p. 3, ¶ 41). *Mazza*, however, does not teach, suggest, or disclose that the configuration engine defines “a plurality of keyboard signal relationships” as recited, in part, in Claim 2. In fact, *Mazza* suggests that using a keyboard does not involve the software components used by the hand-held controller. (*Mazza*; p. 4, ¶ 42). Accordingly, *Mazza* fails to teach, suggest, or disclose a mapping module that defines “a plurality of keyboard signal relationships, each keyboard signal relationship associating one of a plurality of keyboard signals with one of the plurality of trading system commands” as recited, in part, in Claim 2. Because *Mazza* fails to teach, suggest, or disclose this aspect of Claim 2, *Mazza* does not support the rejection. For at least this reason, Applicant respectfully requests reconsideration and allowance of Claim 2.

Second, *Mazza* fails to teach, suggest, or disclose an interface application operable to “reconfigure one or more of the plurality of controller signal relationships based on the received reconfiguration instructions” as recited, in part, in Claim 13. As explained above, the cited reference discloses a configuration engine used to “map the buttons” of the hand-held controller to “specific regions within the proprietary application.” (*Mazza*; p. 3, ¶ 41). *Mazza*, however, makes no mention of “reconfiguration instructions” as recited, in part, in Claim 13. In addition, the cited reference fails to teach, suggest, or disclose that an interface application is operable to “reconfigure one or more of the plurality of controller signal relationships based on the received reconfiguration instructions” as recited, in part, in Claim 13. Because *Mazza* fails to teach, suggest, or disclose this aspect of Claim 13, *Mazza* does not support the rejection.

For at least these reasons, Applicant respectfully requests reconsideration and allowance of amended Claims 2-5, 10, 13, 16-17, 22, 24-25, 28-29, 34, and 36-37.

Section 103 Rejections

The Examiner rejects Claims 6-8, 18-20, and 30-32 under 35 U.S.C. § 103(a) as being unpatentable over *Mazza* in view of U.S. Patent No. 5,896,125 issued to Niedzwiecki (“*Niedzwiecki*”). In addition, the Examiner rejects Claims 9, 21, and 33 as being unpatentable over *Mazza* in view of *Niedzwiecki* and further in view of U.S. Patent No.

5,243,331 issued to McCausland et al. ("*McCausland*"). Applicant respectfully requests reconsideration and allowance of Claims 6-9, 18-21, and 30-33.

Claims 6-9, 18-21, and 30-33 depend from independent claims shown above to be allowable. In addition, these claims recite further elements not taught, suggested, or disclosed by the cited references. For at least these reasons, Applicant respectfully requests reconsideration and allowance of Claims 6-9, 18-21, and 30-33.

The Examiner rejects Claims 11, 23 and 35 under 35 U.S.C. § 103(a) as being unpatentable over *Mazza* in view of U.S. Patent No. 6,071,194 issued to Sanderson et al. ("*Sanderson*"). The Examiner rejects Claims 15 and 27 under 35 U.S.C. § 103(a) as being unpatentable over *Mazza* in view of *McCausland*. Applicant respectfully requests reconsideration and allowance of Claims 11, 15, 23, 27, and 35.

Claims 11, 15, 23, 27, and 35 depend from independent claims shown above to be allowable. In addition, these claims recite further elements not taught, suggested, or disclosed by the cited references. For at least these reasons, Applicant respectfully requests reconsideration and allowance of Claims 11, 15, 23, 27, and 35.

CONCLUSION

For the foregoing reasons, and for other reasons clearly apparent, Applicant respectfully requests full allowance of all pending claims.

If the Examiner feels that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Samir A. Bhavsar, Attorney for Applicant, at the Examiner's convenience at (214) 953-6581.

Applicant amends Claim 12 to be an independent claim. Accordingly, the Commissioner is hereby authorized to charge any required fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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